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25 (See next page for attorney names and Bar numbers)

18 SUPERIOR COURT OF THE STATE OF CALIFORNIA
19 COUNTY OF LOS ANGELES

20 WILLIAM TAYLOR,
21
22 Plaintiff,

23 v.

24 CITY OF BURBANK and
25 DOES 1 through 100, inclusive,
26 Defendants.

Case No. BC 422252
Assigned to: Hon John L. Segal, Dept. 50

JOINT EXHIBIT LIST

FSC Date: Feb. 29, 2012
FSC Time: 8:30 a.m.
Trial Date: March 5, 2012
Action Filed: Sept. 22, 2009

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1 PLEASE TAKE NOTICE that Plaintiff William Taylor ("Plaintiff") and
2 Defendant City of Burbank ("City") hereby identify the exhibits referenced in the attached
3 list to be offered by one or both parties at the trial of this matter and the objections of a
4 party to specified exhibits. The parties reserve their rights to supplement, amend,
5 augment, or reduce this list during the course of the Trial depending on the presentation of
6 evidence, rulings by the Court, and decisions of counsel, and as otherwise provided by
7 law.

10 LAW OFFICES OF GREGORY W. SMITH
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William Taylor v. City of Burbank
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JOINT EXHIBIT LIST

Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
1	P	8/13/2009	Interview-Transcript & Recording of Interview Re Sgt. Gerry Misquez	PC832.7a Insuff. Foundation EC352		
2	P	8/11/2009	Interview-Transcript & Recording of Interview Re J. J. Puglisi	PC832.7a Insuff. Foundation EC352		
3	P	9/10/2009	Interview-Transcript & Recording of Interview Re Janice Lowers	PC832.7a Insuff. Foundation EC352		
4	P	12/10/2009	Interview-Transcript & Recording of Interview 1 Re Chief Tim Stehr	PC832.7a Insuff. Foundation EC352		
5	P	12/15/2009	Interview-Transcript & Recording of Interview 2 Re Chief Tim Stehr	PC832.7a Insuff. Foundation EC352		
6	P	9/30/2009	Interview-Transcript & Recording of Interview Re Deputy Chief William Taylor	PC832.7a Insuff. Foundation		
7	P	00/00/0000	Interview-Video Recording & Translated Transcription of Interview Re Jose Nue Alvarenga	3rd Party Privacy Insuff. Foundation		
8	P	00/00/0000	Interview-Audio Recording & Translated Transcription of Interview Re David Romero	3rd Party Privacy Insuff. Foundation		
9	P	5/1/2008	Interview-Audio Recording & Translated Transcription of Interview Re David Romero taken	3rd Party Privacy Insuff. Foundation		
10	P	5/6/2008	Interview-Audio Recording & Translated Transcription of Interview Re David Romero taken	3rd Party Privacy Insuff. Foundation		
11	P	7/21/2011	Pleading-Declaration of Juli C. Scott	Irrelevant Hearsay Privilege EC352		
12	P	8/7/2008	Evaluation-City of Burbank Appraisal & Development Guide Re William Taylor (Period: Aug. 2007 to Aug. 2008)	No Objection		
13	P	7/7/2007	Evaluation-City of Burbank Appraisal & Development Guide Re William Taylor (Period: July 2006 to July 2007)	Irrelevant EC352		
14	P	10/4/2005	Evaluation-Burbank Police Dept. Progress Review Re Lt. William Taylor (Period: 10/04/2004 to 10/04/2005)	Irrelevant EC352		

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Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
15	P	10/1/2004	Evaluation-Burbank Police Dept. Progress Review Re Lt. William Taylor (Period: 09/30/2003 to 10/01/2004)	Irrelevant EC352		
16	P	7/12/2007	Memorandum-Burbank Police Daily Bulletin Re Captain Bill Taylor Promotion to Deputy Chief	No Objection		
17	P	00/00/2011	List-City of Burbank Merit Pay List (2010, 2011)	Irrelevant Inadm. Opinion Insuff. Foundation		
18	P	12/23/2009	List-Burbank Employee Earnings, 01/08/2009 to 12/23/2009	Irrelevant Inadm. Opinion Insuff. Foundation		
19	P	00/00/0000	List-Deputy Chief Responsibilities	No Objection		
20	P	00/00/0000	Photograph-Album Re Members of the Burbank Police Department	Insuff. Foundation		
21	P	00/00/0000	List-CalPERS List of Pensions Received by Retired CA Government Workers in Excess of \$100,000	3rd Party Privacy Irrelevant Insuff. Foundation EC352		
22	P	12/23/2009	List-Burbank Employee Earnings, 01/08/2009 to 12/23/2009	Irrelevant Inadm. Opinion Insuff. Foundation		
23	P	00/00/2010	List-Burbank Employee Earnings, 2010 Calendar Year	Irrelevant Inadm. Opinion Insuff. Foundation		
24	P	00/00/2010	List-City of Burbank Merit Pay List (2008, 2009, 2010)	Irrelevant Inadm. Opinion Insuff. Foundation		
25	P	00/00/2009	List-City of Burbank Merit Pay List (2007, 2008, 2009)	Irrelevant Inadm. Opinion Insuff. Foundation		
26	P	00/00/0000	Medical Records-Dr. Sean Leoni	Compilation EC352		
27	P	00/00/0000	Personnel Record-William Taylor Skelly Package	Compilation 3rd Party Privacy		
28	P	00/00/0000	Personnel Record-Curriculum Vitae Re Richard M. Kreisler	Irrelevant		
29	P	3/25/2008	Agreement-Agreement for Specialized Investigative Services Between the City of La Mesa and James Gardiner	Irrelevant Insuff. Foundation		

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Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
30	P	00/00/0000	Chart-Portions of Incomplete Gardiner Investigations Re Excessive Use of Force by Other BPD Officers [Incident Reports]	MIL PC832.7a Irrelevant EC352		
31	P	6/22/1990	Personnel Record-Burbank Police Dept. General Order #150 Re Employee Disciplinary Procedures	Irrelevant EC352		
32	P	9/14/2003	Personnel Record-Burbank Police Dept. General Order #149 Re Citizen Complaint/Commendation	Irrelevant EC352		
33	P	00/00/0000	Divider-Sign-Off Sheet for Porto's Investigation	Insuff. Foundation		
34	P	00/00/0000	Chart-Interview Lists [Incident Reports]	Compilation PC832.7a Irrelevant EC352		
35	P	00/00/0000	Table of Contents-Volume II - Burbank Employee Interviews Re BPD IA #04-16-09-1	No Objection		
36	P	00/00/0000	Table of Contents-Volume I - Porto's Personnel Investigation Re BPD IA #04-16-09-1	No Objection		
37	P	00/00/0000	Medical Records-Dr. Stanley Majcher	Compilation Irrelevant EC352		
38	P	1/31/2012	Report-Karen Smith	Hearsay EC352 Compilation		
39	P	11/19/2007	Memorandum-From Deputy Chief Bill Taylor to Chief Tim Stehr Re Valento/Rosoff IA	MIL PC832.7a Irrelevant EC352		
40	P	12/30/2007	Form-Request for Compensation Form by Omar Rodriguez	No Objection		
41	P	3/12/2008	Letter-Recommendation by Juli C. Scott Re Omar Rodriguez	Irrelevant EC352		
42	P	3/17/2008	Letter-Recommendation by Tim Stehr Re Omar Rodriguez	Irrelevant EC352		
43	P	5/13/2008	Memorandum-from Lt. J.J. Puglisi to Deputy Chief Bill Taylor Re Contact with Officer Todd Mofford	MIL PC832.7a Irrelevant Hearsay Inadm. Opinion EC352		
44	P	5/19/2008	Memorandum-from Tim Stehr to Todd Mofford Re Meeting of May 13, 2008	MIL PC832.7a Irrelevant Hearsay Inadm. Opinion EC352		

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Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
45	P	7/16/2008	Memorandum-from Sgt. Gerry Misquez to Deputy Chief Bill Taylor Re Internal Affairs Investigation (#4-26-08-1)	3rd Party Privacy EC352		
46	P	10/16/2008	Presentation-City of Burbank Police Dept. Study Presentation prepared by Willdan Homeland Solutions	Irrelevant EC352 Privilege		
47	P	10/17/2008	Memorandum-from Mary Alvord to Mayor & City Council Re Anonymous Letter	MIL Irrelevant Hearsay EC352 PC832.7a		
48	P	3/25/2009	Memorandum-from Deputy Chief Bill Taylor to Lt. Jay Jette Re Reassignment	MIL Irrelevant EC352 PC832.7a		
49	P	4/13/2009	Memorandum-from Officer Mofford to M. Parrinello & Chief Stehr Re Hostile Work Environment	PC832.7a Irrelevant EC352 MIL		
50	P	5/7/2009	Memorandum-from Sgt. Eddie Ruiz to Cpt. Craig Varner Re Possible Employee Misconduct	EC352		
51	P	6/9/2009	Timeline-Re Porto's Bakery Robbery Investigation Prepared by Gerry Misquez	No Objection		
52	P	6/15/2009	Form-DFEH Charge and Notice of Case Closure Re William Taylor	Hearsay		
53	P	8/3/2009	Pleading-Government Claim filed 8/3/09	Hearsay		
54	P	9/17/2009	Memorandum-From Tim Stehr to Captain Bill Taylor Re Administrative Investigation (4-16-09-1)	No Objection		
55	P	9/22/2009	Pleading-Summons & Complaint filed by William Taylor against City of Burbank	Irrelevant Hearsay EC352		
56	P	10/5/2009	Memorandum-From Cindy Guillen to Judie Wilke Re Sexual Harassment Training Session	MIL Irrelevant EC352		
57	P	11/3/2009	Email-From Marsha Ramos to William Taylor Re Agenda Item 13 Press Releases	Insuff. Foundation Irrelevant EC352		
58	P	4/15/2010	Letter-From Richard Kreisler to William Hadden Re Omar Rodriguez, Reply to April 8, 2010 Letter	Irrelevant Hearsay EC352 PC832.7a		
59	P	4/16/2010	Letter-From Gregory Smith to Scott LaChasse Re Skelly Hearing Response	Hearsay Inadm. Opinion EC352		

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Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
60	P	4/19/2010	Letter-From Gregory Smith to Scott LaChasse Re Confirmation of Captain Taylor's Response to Skelly Hearing	Hearsay Inadm. Opinion EC352		
61	P	4/19/2010	Letter-From Scott LaChasse to Gregory Smith Re Response to Charges	EC352		
62	P	4/27/2010	Letter-From Craig Varner to Gregory W. Smith Re Request for Concurrence for Additional Time for Pre-Disciplinary Written Reply	EC352		
63	P	4/27/2010	Letter-From Gregory Smith to Scott LaChasse Re Request for Immediate Decision	Hearsay Inadm. Opinion EC352		
64	P	4/28/2010	Letter-From Scott LaChasse to Gregory Smith Re Reply to April 27, 2010 Letter	EC352		
65	P	4/28/2010	Letter-From Gregory Smith to Scott LaChasse Re Request for Written Notice of Disciplinary Action	Hearsay Inadm. Opinion EC352		
66	P	5/3/2010	Agreement-Third Amendment to Professional Services Agreement between City of Burbank and James Gardiner	Irrelevant EC352		
67	P	3/31/2010	Memorandum-from Scott LaChasse to Captain Bill Taylor Re Notice of Proposed Termination	No Objection		
68	P	6/4/2010	Letter-From Mary Natividad to Gregory Smith Re Acknowledgment of Receipt of William Taylor's Government Claim	Insuff. Foundation		
69	P	6/4/2010	Pleading-Government Claim filed 6/4/10	Hearsay Inadm. Opinion EC352		
70	P	6/10/2010	Letter-From Geoffrey S. Sheldon to Gregory Smith Re Service of Chief's Notice of Decision for Bill Taylor	No Objection		
71	P	6/10/2010	Memorandum-From Scott LaChasse to Captain Bill Taylor Re Notice of Termination	No Objection		
72	P	6/10/2010	Form-Supplemental DFEH Charge and Notice of Case Closure Re William Taylor	Hearsay Inadm. Opinion EC352		
73	P	7/1/2010	Agreement-Professional Services Agreement between City of Burbank and James Gardiner	Irrelevant EC352		

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Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
200	D		[Reserved]			
201	D		[Reserved]			
202	D		[Reserved]			
203	D		[Reserved]			
204	D		[Reserved]			
205	D	4/13/2009	Memorandum-Hostile Work Environment	Authentication, hearsay.		
206	D		[Reserved]			
207	D	5/4/2009	Email-Burbank Police Daily Bulletin (Departmental Restructuring)	Authentication, hearsay.		
208	D		[Reserved]			
209	D		[Reserved]			
210	D		[Reserved]			
211	D		[Reserved]			
212	D		[Reserved]			
213	D		[Reserved]			
214	D		[Reserved]			
215	D		[Reserved]			
216	D		[Reserved]			
217	D	6/30/2009	Medical Records-[Off Until 7/7/09]	No objection.		
218	D	7/6/2009	Medical Records-Return to Work Certificate	No objection.		
219	D	7/6/2009	Medical Records-Complete Copy of Leoni File	No objection.		
220	D	8/13/2009	Medical Records-Return to Work Certificate	No objection.		
221	D	9/21/2009	Medical Records-Treating Physician's Progress Report	No objection.		
222	D	11/2/2009	Medical Records-Return to Work Certificate	No objection.		
223	D	11/2/2009	Medical Records-Primary Treating Physician's Progress Report (PR-2)	No objection.		
224	D	12/14/2009	Medical Records-Return to Work Certificate	No objection.		
225	D	12/14/2009	Medical Records-Treating Physician's Progress Report/Review Medical Records	No objection.		
226	D	1/25/2010	Medical Records-Return to Work Certificate	No objection.		
227	D	4/14/2010	Medical Records-Treating Physician's Progress Report	No objection.		
228	D	1/0/1900	Medical Records-Agreed Medical Examiner, Internal Medicine Report	Authentication, hearsay.		
229	D		[Reserved]			
230	D	7/5/1985	Personnel Records-Personnel Action Form	Authentication, hearsay, relevance, EC 352		

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Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
231	D	7/5/1985	Personnel Records-Monthly Evaluation - Probationary Officer	Authentication, hearsay, relevance, EC 352		
232	D	8/29/1985	Personnel Records-Personnel Evaluation - Probationary Officer	Authentication, hearsay, relevance, EC 352		
233	D	7/16/2007	Personnel Records-Personnel Action Form - Promotion	Authentication		
234	D	7/16/2007	Personnel Records-Personnel Action Form - Salary Adjustment	Authentication		
235	D	8/2/2007	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
236	D	12/30/2007	Personnel Records-Personnel/Officers Request for Compensation	Authentication		
237	D	1/1/2008	Personnel Records-Personnel Action Form	Authentication		
238	D	1/1/2008	Chart-Organizational Chart	Authentication, hearsay		
239	D	1/3/2008	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
240	D	1/9/2008	Personnel Records-Request for Compensation & personnel forms	Authentication, hearsay		
241	D	2/7/2008	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, failure to produce during meet and confer re: trial documents, hearsay, relevance, EC 352		
242	D	3/5/2008	Letter-Racial Remarks and Hostile Work Environment	No objection.		

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243	D	3/11/2008	Memorandum-Burbank Police Daily Bulletin 'Zero Tolerance Policy'	Authentication, hearsay		
244	D	4/3/2008	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
245	D	5/8/2008	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
246	D	6/29/2008	Resolution-Resolution establishing compensation plan	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
247	D	8/7/2008	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
248	D	00/00/2009	Personnel Records-Diversity Statistics 2009	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		

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Ex No	P/D	Date	Description	Legal Ground(s) for Objection	Date Identified	Date Admitted
249	D	1/11/2009	Form-Personnel Action Form - Salary Adjustment	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
250	D	2/12/2009	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
251	D	3/11/2009	Timeline-Racism Complaint Timeline	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
252	D	04/00/2009	List-Burbank Police Department (FY 09/10)	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
253	D	4/16/2009	Letter-[Requesting Investigation]	No objection.		
254	D	5/10/2009	Email-Efficient Working Environment	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		

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255	D	5/14/2009	Letter-[Re Taylor Not Being "Demoted"]	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
256	D	6/4/2009	Minutes-Management Team Minutes	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
257	D	6/4/2009	Email-Maintaining a Professional Work Environment	Authentication, failure to produce during discovery, hearsay, failure to produce during meet and confer re: trial documents, relevance, EC 352		
258	D	6/9/2009	Timeline-Related to Porto's Bakery Robbery Investigation (07-13380)	Authentication, hearsay		
259	D	6/15/2009	Letter-Notice of Case Closure	Authentication, hearsay, relevance, EC 352		
260	D	6/23/2009	Email-[Re time sheet re: sick time IOD Days]	Authentication, hearsay, relevance, EC 352		
261	D	9/17/2009	Letter-[Service of Ntc. of Admin. Invest. With Orders to Appear 9/30/09]	Authentication, hearsay, relevance, EC 352		
262	D	10/1/2009	Letter-[Attempts to Interview Bill Taylor]	Authentication, hearsay, relevance, EC 352		
263	D	1/21/2010	Memorandum-Administrative Leave with Pay; IA 04-16-09-01	Authentication, hearsay		
264	D	1/21/2010	Letter-[Notification to attorney re: Taylor placed on administrative leave]	Authentication, hearsay		
265	D	3/1/2010	Investigative Report-No. 34 - Taylor	Authentication, hearsay		

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266	D	4/19/2010	Letter-William Taylor [Response to Charges]	Authentication, hearsay		
267	D	4/19/2010	Letter-William Taylor [Response to Charges]	Authentication, hearsay		
268	D	4/27/2010	Letter-Pre-Disciplinary Proceeding re Police Captain William Taylor	Authentication, hearsay		
269	D	6/10/2010	Memorandum-Notice of Termination; IA 04-16-09-01	Authentication, hearsay		
270	D	9/6/2007	Police Report Photograph-Oscar Aguilera	Authentication, hearsay, relevance, EC 352		
271	D	10/18/2007	Police Report Photograph-Richard Norman Lederman	Authentication, hearsay, relevance, EC 352		
272	D	12/28/2007	Police Report Photograph-David Romero	Authentication, hearsay, relevance, EC 352		
273	D	12/29/2007	Police Report Photograph-Jorge Aguilar	Authentication, hearsay, relevance, EC 352		
274	D	1/1/2008	Police Report Photograph-Jens Majano	Authentication, hearsay, relevance, EC 352		
275	D	1/3/2008	Police Report Photograph-Jose Luis Alvarenga	Authentication, hearsay, relevance, EC 352		
276	D	1/4/2008	Police Report Photograph-Jose Guevara	Authentication, hearsay, relevance, EC 352		
277	D	1/4/2008	Police Report Photograph-Jose Guevara	Authentication, hearsay, relevance, EC 352		
278	D	2/1/2008	Police Report Photograph-Ray Govea	Authentication, hearsay, relevance, EC 352		
279	D	2/1/2008	Police Report Photograph-Ray Govea	Authentication, hearsay, relevance, EC 352		
280	D	2/1/2008	Police Report Photograph-Jesse Aguirre	Authentication, hearsay, relevance, EC 352		

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281	D	2/22/2008	Police Report Photograph-David Monterrosa	Authentication, hearsay, relevance, EC 352		
282	D	2/22/2008	Police Report Photograph-David Monterrosa	Authentication, hearsay, relevance, EC 352		
283	D	3/29/2008	Police Report Photograph-Lucio Estrada	Authentication, hearsay, relevance, EC 352		
284	D	00/00/0000	David Weiner Report	Authentication, hearsay, failure to produce during discovery		